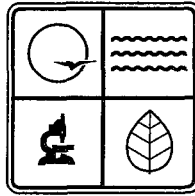


STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI AIR CONSERVATION COMMISSION

**PERMIT BOOK**



## PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **042006-007** Project Number: **2006-01-064**

Owner: **The Ovid Bell Press, Inc.**

Owner's Address: **1201-05 Bluff Street, Fulton, MO 65251**

Installation Name: **The Ovid Bell Press, Inc.**

Installation Address: **1201-05 Bluff Street, Fulton, MO 65251**

Location Information: **Callaway County, S17, T47N, R9W**

Application for Authority to Construct was made for:

**Installation of an 8-unit, 4-color heatweb lithographic web press. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.**

- 
- ☐ Standard Conditions (on reverse) are applicable to this permit.
- ☒ Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

**APR 18 2006**

EFFECTIVE DATE

*Jane C. Kavanagh*  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

2006-01-064

The Ovid Bell Press, Inc.

1201-05 Bluff Street, Fulton, MO 65251

The Ovid Bell Press, Inc.

1201-05 Bluff Street, Fulton, MO 65251

Callaway County, S17, T47N, R9W

Installation of an 8-unit, 4-color heatweb lithographic web press. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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Permit No.	
Project No.	2006-01-064

# SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

The Ovid Bell Press, Inc.  
Callaway County, S17, T47N, R9W

1. **Superseding Condition**  
The conditions of this permit supersede all special conditions found in the previously issued construction permits, Permit Number 042002-017 and Permit Number 0897-011 from the Air Pollution Control Program.
2. **Emission Limitation**
  - A. The Ovid Bell Press, Inc. shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the installation in any consecutive 12-month period.
  - B. The Ovid Bell Press, Inc. shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the installation in any consecutive 12-month period.
  - C. Attachment A, Attachment B, and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A) and 1(B). The Ovid Bell Press, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at this installation.
  - D. The Ovid Bell Press, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(C) indicate that the source exceeds the limitation of Special Conditions Number 1(A) & 1(B).

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Permit No.	
Project No.	2006-01-064

### SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

3. Solvent/Ink Cloths

The Ovid Bell Press, Inc. shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. The Ovid Bell Press, Inc. shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

4. Restriction of Odors

A. If a situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, *Restriction of Emission of Odors*, the Director may require Ovid Bell Press, Inc. to submit a corrective action plan within ten (10) days to timely and significantly mitigate the odors. Ovid Bell Press, Inc. shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of this permit.

B. If a continued situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require Ovid Bell Press, Inc. to collect air quality monitoring data regarding Volatile Organic Compounds (VOCs) at its property boundary. The monitoring site should be located in the area of highest estimated concentrations. Ovid Bell Press, Inc. will file, and receive approval from the Director, a Quality Assurance Project Plan prior to commencing operation. Data collecting shall continue until notice of release from this requirement is received by Ovid Bell Press, Inc.. from the Director. The Director shall evaluate the need for continued data collection annually and report the findings of the evaluation to Ovid Bell Press, Inc..

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2006-01-064  
Installation ID Number: 027-0003  
Permit Number:

The Ovid Bell Press, Inc.  
1201-05 Bluff Street  
Fulton, MO 65251

Complete: January 20, 2006  
Reviewed: February 17, 2006

Parent Company:  
The Ovid Bell Press, Inc.  
1201-05 Bluff Street  
Fulton, MO 65251

Callaway County, S17, T47N, R9W

REVIEW SUMMARY

- The Ovid Bell Press, Inc. has applied for authority to install an 8-unit, four 4-color heatweb lithographic web press.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are xylene and ethyl benzene.
- Subpart QQ of the New Source Performance Standards (NSPS), *Standards of Performance for the Graphic Art Industry, Publication Rotogravure Printing* does not apply to this process since lithographic printing technique is used.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. Subpart KK, *Printing/Publishing*, does not apply to lithographic printing.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.
- This installation is located in Callaway County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- Revision to your Basic Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

The Ovid Bell Press, Incorporated is an existing printing press installation (Installation ID Number 027-0003) in Fulton, Missouri. They have applied for the authority to install an 8-unit, 4-color lithographic web press. The entire installation has been conditioned to less than 100 ton per year of volatile organic compounds (VOCs), ten (10.0) tons of any single HAP and 25.0 tons per year of aggregate HAPs.

The Ovid Bell Press, Incorporated has submitted a Basic Operating Permit renewal (Project Number 2004-04-024) to the Air Pollution Control Program. The following construction permits have been issued to The Ovid Bell Press, Incorporated from the Air Pollution Control Program.

Permit Number	Description
0594-002	38" lithographic web press with two 2.4 MMBtu/hr natural gas dryers
0296-017	5-unit, 5 color web press
0897-011	Addition of 2 color units to existing 2-unit lithographic web press
042002-017	Installation of a six (6) unit lithographic sheet-fed press

## PROJECT DESCRIPTION

The Ovid Bell Press, Incorporated has applied for the authority to install an 8-unit, 4-color heatweb lithographic web press (EP-30). The maximum hourly design rates (MHDRs) were calculated based upon actual chemical usage from an existing, 4-unit, 4-color press that has ran continuously (8,760 hours per year), and then scaled by a factor of two (2) to represent the 8-unit instead of a 4-unit process. The MHDRs for the heatset ink, fountain solution, and blanket wash are 6.16, 0.46, and 3.20 pounds per hour, respectively. The press will be equipped with two (2) natural gas dryers (EP-31) each rated at 6.6 million BTU per hour. The new press will not utilize any air pollution control devices.

## EMISSIONS/CONTROLS EVALUATION

VOCs and HAPs are the main pollutants from this project. The potential emissions of this project were determined by mass balance computations derived from applicable Material Safety Data Sheets (MSDS), assuming 80% of the VOCs in the inks and 100% of the VOCs in the blanket wash and fountain solution are emitted to the ambient air. The potential VOC and HAP emissions were based upon the chemical/ink for each particular usage with the maximum content, respectively. Potential emissions of all HAPs are below their respective Section 112(g) de minimis levels.

The emission factors for the combustion of natural gas in the dryers associated with the printing press were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, *Natural Gas Combustion* (7/98).

Existing potential emissions were taken from Permit Number 042002-017. The existing potential emissions of VOCs and HAPs in Permit Number 042002-017 are based upon limitations given in Permit Number 0897-011. In this permit, these limitations are superseded and reestablished to include the new equipment. Existing actual emissions were taken from the installation's 2004 Emission Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2004 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	0.17	0.02	0.42	N/A
SO <sub>x</sub>	40.0	0.01	<0.01	0.03	N/A
NO <sub>x</sub>	40.0	1.38	0.24	5.51	N/A
VOC	40.0	100	36.58	25.18	<100.0
CO	100.0	0.29	0.20	4.63	N/A
HAPs	10.0/25.0	10.0/25/0	N/D	0.36	<10.0/25.0
Ozone	40.0	N/D	N/D	N/D	N/A
Xylene	10.0	N/D	N/D	0.29	N/A
Ethyl Benzene	10.0	N/D	N/D	0.07	N/A

N/A = Not Applicable; N/D = Not Determined



## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels.

## APPLICABLE REQUIREMENTS

The Ovid Bell Press, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Susan Heckenkamp  
Environmental Engineer

\_\_\_\_\_  
Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 18, 2006, received January 20, 2006, designating The Ovid Bell Press, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated January 27, 2006 .

## Attachment A: Monthly VOC Tracking Record

The Ovid Bell Press, Inc.  
Callaway County, S17, T47N, R9W  
Project Number: 2006-01-064  
Installation ID Number: 027-0003  
Permit Number:

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

Copy this sheet as needed.

Column 1	Column 2 (a)	Column 3	Column 4	Column 5
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (Pounds per Gallon)	VOC Content (Weight %)	VOC Emissions (Tons)
(b) Total VOC Emissions Calculated for this Month in Tons:				
(c) 12-Month VOC Emissions Total from Previous Month's Attachment A, in Tons:				
(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in Tons:				
(e) Current 12-month Total of VOC Emissions in Tons: [(b) + (c) - (d)]				

### Instructions: Choose appropriate VOC calculation method for units reported:

- (a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];  
2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];  
3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].
- (b) Summation of [Column 5] in Tons;  
(c) 12-Month VOC emissions total (e) from last month's Attachment A, in Tons;  
(d) Monthly VOC emissions total (b) from previous year's Attachment A, in Tons; and  
(e) Calculate the new 12-month VOC emissions total. **A 12-Month VOC emissions total (e) of less than 100.0 tons for the installation indicates compliance.**

The Ovid Bell Press, Inc.  
Callaway County, S17, T47N, R9W  
Project Number: 2006-01-064  
Installation ID Number: 027-0003  
Permit Number:

Copy this sheet as needed.

Instructions: Choose appropriate HAP calculation method for units reported:

- 10 -

### Attachment C: Monthly Individual HAPs Tracking Record

The Ovid Bell Press, Inc.  
Callaway County, S17, T47N, R9W  
Project Number: 2006-01-064  
Installation ID Number: 027-0003  
Permit Number:

HAP Name: CAS No.:

This sheet covers the month of \_\_\_\_\_ in the year \_\_\_\_\_.

Copy this sheet as needed.

[illegible]

Instructions: Choose appropriate HAP calculation method for units reported

- Individually list each material which emits this specific HAP from this installation;
- Record the amount of HAP emissions already calculated for Attachment B in [Column 5] in Tons;
- Summation of [Column 5] in Tons;
- Record the previous 12-Month individual HAP emission total (f) from last month's Attachment C, in Tons;
- Record the monthly HAP emission total (c) from previously year's Attachment C, in Tons; and
- Calculate the new 12-month individual HAP emissions total. **A 12-Month individual HAP emissions total of less than ten (10.0) tons for the installation indicates compliance.**

Ms. Julie O'Donley  
Safety & Environmental Coordinator  
The Ovid Bell Press, Inc.  
1201-05 Bluff Street  
Fulton, MO 65251

RE: New Source Review Permit - Project Number: 2006-01-064

Dear Ms. O'Donley:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your revised operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:smhl

Enclosures

c: Northeast Regional Office  
PAMS File 2006-01-064

Permit Number: